

# Request for Public Comment



## Pools Prairie Superfund Site Neosho, Missouri

July 2002

### Proposed Corrective Action Management Unit Designation for the Components Test Area at the Site

In April 2001, you were asked to comment on the proposed cleanup plan for the Pools Prairie Superfund Site when a Corrective Action Management Unit (CAMU) was suggested. Some regulations have been revised since then and we are again asking for your comments.

The new regulations call for:

- 1) defining the types of wastes that can go into a CAMU (called CAMU-eligible)
- 2) increased levels of design and operating standards for CAMUs
- 3) establishing treatment standards for the wastes to remain in a CAMU
- 4) a public review and comment period

EPA believes the requirements of the regulation are met because:

- the wastes will be confined to those existing on the Test Site
- the wastes are CAMU-eligible
- the contaminated soils are CAMU-eligible without the area having to be lined or capped
- more than one CAMU is permitted on a site and as many as two are being proposed

As part of the ongoing cleanup activities at the Components Test Area (CTA) of the Pools Prairie Superfund Site, the United States Environmental Protection Agency (EPA) is proposing to designate a portion of the CTA as a Corrective Action Management Unit (CAMU). A CAMU is a special unit created under the Resource Conservation and Recovery Act (RCRA) to facilitate the treatment, storage, and disposal of hazardous wastes managed while implementing a cleanup action.

In April 2001 EPA requested comments on a proposed cleanup plan for the CTA as described in the document entitled "Final Engineering Evaluation/Cost Analysis, Components Test Area, Pools Prairie Site, Newton County, Missouri" dated March 2001 (CTA EE/CA). This plan called for excavation and on-site

treatment of contaminated soils in the Former Primary Lagoon Area. After treatment, some or all of the soils would be re-deposited in the Former Primary Lagoon Area excavation. The CTA EE/CA suggested the possibility of designating a CAMU in conjunction with implementation of the proposed action.

On January 22, 2002, EPA promulgated revised CAMU regulations which changed the requirements for CAMUs from those in effect when EPA requested comment on the CTA EE/CA. The revised CAMU regulations can be found at 67 Fed. Reg. 2962. Changes made in the revised CAMU regulations include (1) defining the types of waste which can be placed in a CAMU, i.e., so called "CAMU-eligible wastes;" (2) establishing more detailed minimum design and operating standards for

CAMUs in which waste will remain after closure; (3) establishing treatment standards for wastes placed in CAMUs; (4) requiring that the public be given notice and a reasonable opportunity for public comment before final CAMU determinations are made; and (5) establishing new requirements for CAMUs that will only be used for storage and treatment.

In light of the revised regulations EPA is requesting your comments specifically on the proposed CAMU designation. Key factors in making this proposal are as follows:

1. The area EPA proposes to designate meets the definition of a CAMU. Under the new regulations, a Corrective Action Management Unit means an area within a facility that is used only for managing CAMU-eligible wastes for implementing corrective action or cleanup at the facility. The area EPA is proposing to designate as a CAMU is shown on the attached map, which is based on Figure 8-1 from the CTA EE/CA. This area is located entirely on the Test Site and will only be used for managing waste as part of cleanup activities at the Test Site. As discussed below, EPA believes these wastes are CAMU-eligible wastes.

2. The contaminated soils are CAMU-eligible wastes. As defined in the revised CAMU regulations, CAMU-eligible waste means "all solid and hazardous wastes, and all media (including ground water, surface water, soils and sediments) and debris, that are managed for implementing cleanup." The wastes to be stored, treated and disposed of in the CAMU are soils contaminated with various volatile organic chemicals (VOCs), primarily trichloroethylene, to be excavated from the Former Primary Lagoon Area at the CTA. EPA believes these contaminated soils fall within this definition of CAMU-eligible wastes.

3. Planned waste storage, treatment and disposal activities meet the requirements of the new CAMU regulations. The revised regulations establish more specific design standards for CAMUs in which waste will remain after closure. However, the regulations provide that CAMUs with wastes which have been treated so that constituent levels are at or below remedial levels or goals are not required to install either a liner or a cap. Such CAMUs are required to meet minimum treatment standards, as specified in the revised CAMU regulations. The target treatment standard specified in the CTA EE/CA is 1 mg/kg of total volatile organic chemicals (VOCs), which is the remedial goal for CTA soils. The 1 mg/kg total VOCs is a substantially more stringent level than the minimum treatment standards for wastes to be placed in a CAMU, as described in the revised CAMU regulations. Thus, EPA believes that the contaminated soils will meet the CAMU regulation's requirement to be re-deposited on site without the disposal area having to be lined or capped.

The Former Primary Lagoon Excavation Area, which is also the area in which treated soils would be re-deposited, and the area proposed to be used for storage and treatment of the excavated soils, are depicted on the attached map. The area actually used for storage and treatment may vary slightly from the area shown in this figure. The revised regulations provide for designating one or more CAMUs at a facility. EPA is considering either designating one CAMU, encompassing both the Former Primary Lagoon Excavation Area and the storage/treatment area as shown on the map, or designating two CAMUs, one for the Former Primary Lagoon Excavation Area and a second CAMU for the storage/treatment area. EPA welcomes your comments on the relative merits of designating one CAMU or two.

The CTA EE/CA and a copy of the new CAMU regulations referenced above, along with other information about the Pools Prairie Site, is a part of the Pools Prairie Administrative Record File. The Pools Prairie Administrative Record File and the CTA EE/CA are available for public review at the following locations:

Neosho Public Library  
201 W. Spring  
Neosho, Missouri

EPA Region 7, Docket Room  
901 N. 5<sup>th</sup> Street  
Kansas City, Kansas

EPA is currently asking for comments on the proposed designation of portions of the CTA as a CAMU. The 30-day comment period opens July 25, 2002 and closes August 23, 2002. Comments can be submitted in writing (post-marked no later than August 23, 2002), to:

David Williams  
EPA Region 7  
Superfund Division  
901 N. 5<sup>th</sup> Street  
Kansas City, Kansas 66101

Comments can also be e-mailed to  
[williams.dave@epa.gov](mailto:williams.dave@epa.gov)